

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JARED ROSS BOSWELL,

Defendant.

CR 19-51 DWF/LIB  
**INDICTMENT**

18 U.S.C. § 1467  
18 U.S.C. § 1470  
18 U.S.C. § 2252(a)(2)  
18 U.S.C. § 2252(b)(1)  
18 U.S.C. § 2253(a)  
18 U.S.C. § 2261A(2)(B)

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**  
(Stalking)

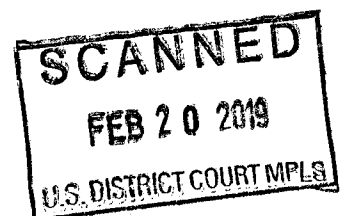
From in or about April 2018 through September 2018, in the State and District of Minnesota, the defendant,

**JARED ROSS BOSWELL,**

did with the intent to harass, used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Minor A, all in violation of Title 18, United States Code, Section 2261A(2)(B).

**COUNT 2**  
(Distribution of Child Pornography)

On or about September 7, 2018, in the State and District of Minnesota, the defendant,



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**JARED ROSS BOSWELL,**

did knowingly distribute visual depictions to Minor B, using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: a computer image file titled image-2000674590223346, all in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT 3**

(Distribution of Child Pornography)

On or about September 7, 2018, in the State and District of Minnesota, the defendant,

**JARED ROSS BOSWELL,**

did knowingly distribute visual depictions, using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, to wit: a computer image file titled image-1812622162166751, all in violation of Title 18, United States Code, Sections 2252(a)(2) 2252(b)(1).

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**COUNT 4**

(Transfer of Obscene Material to Minors)

On or about September 14, 2018, in the State and District of Minnesota, the defendant,

**JARED ROSS BOSWELL,**

did by means of interstate and foreign commerce, specifically the Internet, knowingly transfer and attempt to transfer obscene matters to another individual, Minor B, who had not attained the age of 16 years, knowing that Minor B had not attained the age of 16 years, all in violation of Title 18, United States Code, Section 1470.

**FORFEITURE ALLEGATIONS**

Counts 2 through 4 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1467 and 2253(a).

Upon conviction of the offenses charged in Counts 2 and 3 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

- (1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

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- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including the following property: (a) one Dell Inspiron 15 with serial number JY4Y832, (b) one Toshiba hard disk drive with serial number 1526S6RMSYY3HDKEB98D2A01A, and (c) one black ZTE cellular phone model no. 785.

Upon conviction of the offense charged in Count 4 of this Indictment, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 1467:

- (1) any obscene material produced, transported, mailed, shipped, or received in violation of Chapter 71, United States Code;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including the following property:
  - (a) one Dell Inspiron 15 with serial number JY4Y832, (b) one Toshiba hard disk drive with serial number 1526S6RMSYY3HDKEB98D2A01A, and (c) one black ZTE cellular phone model no. 785.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title

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21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 1467, 1470, 2252(a)(2), 2252(b)(1), and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON